Korean "Case Stacking" Isn't: Unifying Noncase Uses of Case Particles

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1. Introduction

Since at least the introduction of Vergnaud's Case Filter into syntactic theory, it has been an important and controversial question how close the relationship is between abstract Case, which is assumed to license NPs, and morphological case, the overt form of case in the traditional sense. Korean exhibits a construction that appears prima facie to bear on this question in an interesting way. Korean appears to allow more than one case morpheme on a single noun phrase in a simple sentence (Gerdts & Youn 1988 and references cited there). (1a) shows a canonical subject marked with the NOM particle *ka*; (1b) shows that the same predicate can also take a subject marked with the DAT particle *eykey*. (1c) shows these two apparent case particles co-occurring on the subject: NOM "stacked on top of" DAT.

(1) a. Swunhi-ka Yenghi-ka cohta.
S-NOM Y-NOM likes
'Swunhi likes Yenghi.'

b. Swunhi-eykey Yenghi-ka cohta.
S-DAT Y-NOM likes
'Swunhi likes Yenghi.'

c. Swunhi-eykey-ka Yenghi-ka cohta.
S-DAT-NOM Y-NOM likes
'Swunhi likes Yenghi.'

Under almost every existing analysis of this "case stacking" construction that I am aware of, the *ka* in (1c) is in fact a case morpheme (Gerdts & Youn 1988, Gerdts 1991, Yoon & Yoon 1991, Harbert & Toribio 1993, Hong 1992, Park 1991, O'Grady 1991). Under this view, a DAT subject bears an inherent/lexical/quirky case that is not sufficient to license its appearance in subject position; it must additionally receive "structural" Case, which for subjects in Korean is NOM. The claim that has been made in various frameworks is

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that *ka* in (1c) represents the overt realization of the structural NOM case feature and is thus identical to the *ka* on the subject in (1a), but to my knowledge no direct arguments for this claim have been made. In this paper, I argue that this is not the correct analysis of case stacking in Korean. Furthermore, I suggest that the assumption behind such analyses should be rejected, that is, licensing an NP as the subject does *not* imply bestowing it with morphological NOM case features. I present data that point towards a treatment of stacked *ka* as a focus particle.

Before proceeding, we require some descriptive background. First, I note that not all Korean speakers accept case-stacking sentences like (1c). This paper describes the dialect of my principal consultant, though I have been able to confirm many of the crucial judgments with one other speaker of a stacking dialect. Second, many interesting questions that we might want to ask about possible combinations of case particles are unanswerable because these particles are subject to morphological co-occurrence restrictions. Descriptively, there are four post-nominal particle slots relevant here, as shown in (2): a given particle can occur in only one of them, and each slot can contain at most one particle. Third, while I always refer to the NOM particle as *ka*, it sometimes surfaces as the phonologically-conditioned allomorph *i*.

(2)

N_{root}	Postposition		Conjunctive	'X-lim'	'Z-lim'	
	eykey	DAT	pwuthe 'from'	man 'only'	ka	NOM (after vwl)
	kkey	HON.DAT	*etc.*	*etc.*	i	NOM (elsewhere)
	ey	DAT/LOC			(l)ul	ACC
	eyse	LOC			(n)un	TOP/CONTR
	(u)lo	DIR			uy	GEN
	kkeyse	HON.NOM (subj)				

2. Against case stacking

I enumerate five aspects of the behavior of stacked *ka* that are unexpected if it is merely the (optional) realization of a structural NOM case feature. First, sentences like (1c) require marked prosody to sound felicitous: typically, there should be a pause after the subject, and a pitch accent on *ka*. Neither of these requirements hold in (1a) or (1b). This suggests that there is something special about the discourse status of the subject in (1c). If stacked *ka* were simply a NOM case marker, one would need some additional theory to explain why case stacking triggers this prosodic effect.

Second, *ka*-stacking is completely optional, whereas NOM case on a transitive subject is obligatory, as in (3), except in very informal registers (cf. Y-j Kim 1990, p. 204, fn. 44). This may be explained if stacked *ka* is conditioned by discourse factors; it requires a stipulation if stacked *ka* is NOM case.

(3) Minca-**??(ka)** Yongho-lul mannasse.
M-??(NOM) Y-ACC met
'Minca met Yongho.'

The third argument concerns the distribution of subject honorification. NOM subjects must trigger honorific agreement on the predicate in Korean when they refer to an honored person (4a), but for some speakers, including my consultant, DAT subjects cannot trigger such agreement (4b), as noted also by Y-j Kim (1990, p. 248, fn. 3). This would follow if honorific agreement and NOM case both reflect spec-head feature-checking with INFL (however, agreement-based treatments of honorification are controversial—such analyses are adopted by Y.-B. Kim (1987), J.-Y. Yoon (1990), and Choe

(1988), but rejected by S.-K. Yun (1991), Y-j Kim (1990), and Sells (1995, fn. 21)). Regardless of the analysis, if stacked *ka* were NOM case, it too should require honorific agreement, but in fact it disallows it (4c).

(4) a. Kyosunim-**i** Yenghi-ka mwusewu-**si**-ta/*mwusep-ta.
*teacher-NOM Y-NOM fear-SH-DECL/*fear-DECL* [SH = subject honorific agrmt]
'The teacher fears Yenghi.'

b. Kyosunim-**eykey** Yenghi-ka mwusep-ta/*mwusewu-**si**-ta.
*teacher-DAT Y-NOM fear-DECL/*fear-SH-DECL*
'The teacher fears Yenghi.'

c. Kyosunim-**eykey-ka** Yenghi-ka mwusep-ta/*mwusewu-**si**-ta.
*teacher-DAT-NOM Y-NOM fear-DECL/*fear-SH-DECL*
'The teacher fears Yenghi.'

Fourth, *ka*-stacking is not limited to subjects, but occurs also on *by*-phrases (5) (for some speakers), locatives (6), temporal adjuncts (7), etc., where structural NOM case is not assignable—these elements fail subjecthood tests. A structural case account of *ka* in (1c) would thus require a separate treatment of examples like (5–7).

(5) %Holangi-eykey(-**ka**) koyangi-ka mekhiessta.
tiger-DAT(-NOM) cat-NOM eat.PASS
'The cat was eaten by the tiger.'

(6) %Ku kulus-eyse-**ka** mul-i saynta.
the bowl-from-NOM water-NOM leaks
'Water leaks from the bowl.' (Hong 1992: 153)

(7) Ecey-pwuthe(-**ka**) nalssi-ka coaciessta.
yesterday-from(-NOM) weather-NOM good.became
'From yesterday the weather became good.'

The fifth argument comes from Q-float. Floated numeral quantifiers generally agree with their head noun in case in Korean, as shown for NOM in (8). (9a) shows agreement with a DAT subject, which is allowed for some speakers (Hong 1992, p. 53, fn. 32; others disallow floating from datives altogether). If stacked *ka* reflected morphological NOM case features, then speakers who accept (9a) should allow a NOM quantifier to agree with a stacked subject, at least as one option. However, this is not the case: as (9b) shows, such a quantifier must be DAT. (It is possible to have *stacked ka* on the quantifier in addition to DAT, as in (9c), but I suggest that this, like other stacked uses of *ka*, does not represent NOM case.)

(8) **Haksayng-i** ecey **seys-i** ttenassta.
student-NOM yesterday 3-NOM left
'Three students left yesterday.'

(9) a. Haksayngtul-**eykey** ton-i **seys-eykey** philyohata.
students-DAT money-NOM 3-DAT need
'Three students need money.'

b. Haksayngtul-**eykey-ka** ton-i **seys-eykey/*i** philyohata.
*students-DAT-NOM money-NOM 3-DAT/*NOM need*
'Three students need money.'

c. Haksayngtul-eykey-ka ton-i seys-eykey-ka philyohata.
students-DAT-NOM money-NOM 3-DAT-NOM need

3. In favor of a focus treatment

If case stacking *isn't* case, what is it? I now present evidence pointing towards a treatment of stacked *ka* as an indicator of focus, a suggestion that has been made by J.-Y. Yoon (1989), Suh (1992), and Hong (1992, p. 147, fn. 15). The semantic effect of stacking *ka* seems to be to mark information focus, that is, new information that is not necessarily contrastive or exhaustive. As an example, (10b) shows that stacking is fine on the answer to a subject *wh*-question, at least for my consultant (some others find this odd).

(10) a. Q: Nwukwu-eykey ton-i manh-ni?
who-DAT money-NOM has.much-Q
'Who has a lot of money?'

b. A: Chelswu-eykey-**ka** ton-i manha.
C-DAT-NOM money-NOM has.much
'Chelswu has a lot of money.'

In a non-question context such as (11), a stacked subject does not necessarily imply that Swunhi is the only one who fears the professor, though it may imply or presuppose that there are some people who do not fear the professor.

(11) Swunhi-**eykey-ka** kyosunim-i mwusepta.
S-DAT-NOM prof-NOM fears
'Swunhi fears the professor.'

Stacking can also occur in correction contexts, typically assumed to involve focus:

(12) a. A: Swunhi-eykey Chelswu-ka cohta.
S-DAT C-NOM likes
'Swunhi likes Chelswu.'

b. B: Ani, Yenghi-**eykey-ka** Chelswu-ka cohta.
no Y-DAT-NOM C-NOM likes
'No, Yenghi likes Chelswu.'

Finally, stacking is compatible with overt focus markers such as 'only':

(13) Sensayngnim-tul-**kkeyse**-man(-**i**) kulen il-ul hasipnita.
teacher-PL-HON.NOM-only(-NOM) that.kind work-ACC do
'Only teachers do such work.' (Sells 1995: 294)

There are some additional semantic and distributional properties of stacking constructions that fall into place under a focus treatment. First, as we would expect if stacking marks focus, it can occur on *wh*-words, as in (14). This usage again does not imply contrast.

(14) Nwukwu-eykey-**ka** Mary-ka mwusep-ni?
who-DAT-NOM M-NOM fear-Q
'Who is afraid of Mary?'

Interestingly, *ka*-stacking is obligatory on the complement to the negated copula *anila*: in the second clause of (15), omitting stacked *ka* is ungrammatical, even for some speakers who do not otherwise allow *ka*-stacking at all. In fact, all complements of *anila* obligatorily take *ka*, as shown in (16). The obligatoriness of plain *ka* in (16) is standardly described as obligatory NOM case assignment, but if I am right that stacked *ka* in (15) is not case, then that cannot be the right analysis. I suggest that what is actually going on is obligatory *focus* marking, perhaps triggered by the presence of negation. (Horvath (1995) argues that NEG is a focus assigner in Hungarian.)

(15) Haksayngtul-eykey(-ka) ton-i philyohata kyosunim-eykey-*(ka) anila.
students-DAT(-NOM) money-NOM need professor-DAT-(NOM) not.be*
'Students need money, (it's) not profs.'

(16) Yenghi-ka Chelswu-lul poatta, Swunhi-*(ka) anila.
Y-NOM C-ACC saw, S-(NOM) not.be*
'Yenghi saw Chelswu, (it was) not Swunhi.' (ambiguous)
(= Yenghi didn't see Swunhi OR Swunhi didn't see Chelswu)

Next, since Korean has been argued to be a multiple focus language by Choe (1995), as in (17), we expect that multiple *ka*-stacking should be possible, and that is correct: (18) receives a double information focus reading.

(17) Na-nun ECEY KU CHAYK-UL sassta.
I-TOP yesterday the book-ACC bought
'I bought THE BOOK YESTERDAY.' (Choe 1995: 280)

(18) Cip-aneyse-ka kyewul-ey-ka Swunhi-eykey nampyen-i mwusepta.
house-in-NOM winter-in-NOM S-DAT husband-NOM fears
'In the house in winter Swunhi fears her husband.'

Finally, let us consider indefinite subjects. (19a), with an indefinite DAT subject, is ambiguous between existential and specific readings. However, when *ka* is stacked on the subject, as in (19b), it becomes unambiguous: it can only be specific. Similarly, *ka*-stacking disambiguates against an existential and towards a generic reading of a bare plural subject, as in the stacked (20c) versus the ambiguous (20a and b). (Note how hard it would be for a case treatment of the *ka* in (20c) to get this result: adding NOM to the ambiguous (20a) actually *removes* a reading that the NOM-subject version (20b) had by itself.) Thus, what we seem to need is an account under which stacked *ka* requires its host to be outside the nuclear scope.

(19) a. Etten-salam-eykey Yenghi-ka cohta.
some-person-DAT Y-NOM likes
'Someone likes Yenghi.' (existential or specific)

b. Etten-salam-eykey-ka Yenghi-ka cohta.
some-person-DAT-NOM Y-NOM likes
'Someone likes Yenghi.' (specific only)

(20) a. Sopangswu-eykey kyewul palam-i mwusepta.
fireman-DAT winter wind-NOM fear
'Firemen fear the winter wind.' (existential or generic)

b. Sopangswu-**ka** kyewul palam-i mwusepta.
fireman-NOM winter wind-NOM fear
'Firemen fear the winter wind.' (existential or generic)

c. Sopangswu-**eykey**-**ka** kyewul palam-i mwusepta.
fireman-DAT-NOM winter wind-NOM fear
'Firemen fear the winter wind.' (generic only)

The necessity of specific or generic interpretation of indefinites is a property usually associated with topics. Thus, if stacking were really topic marking, the facts in (19–20) would follow under most theories. But there are several reasons to doubt that this is the right account. First, we have already seen that stacking does not *have* to imply topichood: if it did, then stacking should be bad on *wh*-words. Also, Choe (1995) claims that Korean does not have multiple topics (21).

(21) Chelswu-**nun** ku chayk-UN/***un** ecey sassta.
*C-TOP the book-CONTR/*TOP yesterday bought*
'Chelswu bought THE BOOK yesterday.' (Choe 1995: 285)

If this is correct then the existence of multiple stacking as in (18) also show that stacking cannot uniformly mark topics. Additionally, I now present data showing that stacking is often *incompatible* with topichood. For instance, in my consultant's judgment, (20c) is a possible answer to the question "Who fears the winter wind?", where *firemen* in the response will be new information, but it is *not* a possible answer to a generic question like "Tell me about firemen", whereas (20a) (and less felicitously (20b)) *can* answer that question. This reinforces the claim that the stacked element must introduce new information and cannot be a topic. This means we need a different explanation of the facts about indefinites in (19–20). One way to get this would be to follow Choe in proposing that Korean has an A-bar focus position above IP where foci (at least subjects) must move by LF, and to require in addition that reconstruction from that position is impossible, at least for quantifier interpretation. Then it would follow that foci must be outside the nuclear scope at LF and therefore cannot get an existential reading. I leave it for future research to establish whether there is any independent support for such an approach.

4. Distribution of *ka* and *lul* stacking

4.1 Stacked lul *also isn't case*

Before we can undertake a specific account of *ka* as a focus marker, we need to consider a set of facts about the distribution of *lul*, the ACC particle. As it turns out, *lul* also has a secret life as a marker of focus, stacked on other case markers. In (22) it appears stacked on a DAT marker of a goal phrase, where it too receives prosodic prominence.

(22) Swunhi-ka Yenghi-eykey(-**lul**) chayk-ul cwuessta.
S-NOM Y-DAT(-ACC) book-ACC gave
'Swunhi gave Yenghi the book.'

(22) is a felicitous answer to a simple goal *wh*-question like "Who did Swunhi give the book to?", which does not set up a contrastive reading. I argue that stacked *lul* also should not be analyzed as a case marker. (Interestingly, among the speakers I have consulted, *lul*-stacking is acceptable if and only if *ka*-stacking is acceptable.) First, stacked *lul* is optional (22). Second, it clearly appears on non-direct objects, as in (22), even when

the ACC direct object is presumably consuming the structural object case. Third, stacked *lul* blocks the existential reading of an indefinite (23b).

(23) a. John-i **etten-salam-eykey** chayk-ul cwuessta.
J-NOM some-person-DAT book-ACC gave
'John gave someone a book.' (existential or specific)

b. John-i **etten-salam-eykey-lul** chayk-ul cwuessta.
J-NOM some-person-DAT-ACC book-ACC gave
'John gave someone a book.' (specific only)

Fourth, multiple stacked *lul*s are possible for multiple pieces of new information, as in (24a and b):

(24) a. Ecey-pwuthe-**lul** John-i han sikan tongan-ssik-**ul** swuhak kongpwu-lul haki
yesterday-from-ACC J-NOM one hour for-each-ACC math study-ACC do
sicak hayssta.
start did
'Yesterday John started studying math for one hour.'

b. John-i Swunhi-eykey-**lul** Yenghi-ey tayhayse-**lul** iyaki hayssta.
J-NOM S-DAT-ACC Y-LOC about-ACC talk did
'John talked to Swunhi about Yenghi.'

Fifth, a floated quantifier cannot take ACC marking in agreement with stacked *lul* (25a).

(25) a. *Swunhi-ka haksayng-tul-**eykey-lul** seys-**ul** iyaki hayssta.
S-NOM student-PL-DAT-ACC 3-ACC talk did
('Swunhi talked to three students.')

b. Swunhi-ka haksayng-tul-**eykey-lul** seys-**eykey** iyaki hayssta.
S-NOM student-PL-DAT-ACC 3-DAT talk did
'Swunhi talked to three students.'

What I claim, then, is that both *ka* and *lul* are ambiguous between a case marker and a focus marker (cf. J.-Y. Yoon 1989, 1990, who treats the noncase particles as secondary theta-role marks and/or emphatic focus markers; Sohn 1994). This raises the obvious question of what the relation between stacked *ka* and stacked *lul* is: Are they in free variation? The answer is no. In all the stacking examples we have seen so far (except (24a)), if one were to replace *ka* with *lul* or vice versa, the result would be ungrammatical. Is the choice determined by the identity of the case onto which one is stacking? Again, no, because we have seen both *ka* and *lul* stacked on top of DAT *eykey*. So what is going on?

4.2 Choice of **ka** *versus* **lul** *stacking*

The contrast in (26) shows that some property of the main predicate is relevant to the choice of *ka* versus *lul*, since the same PP in the same position takes *ka* with 'become good' but *lul* with 'ban'. Examination of the earlier examples plus additional ones listed in (27) for *lul* and (28) for *ka* leads to the provisional generalization in (29).

(26) a. Ecey-pwuthe-**ka** nalssi-ka coa-ciessta.
yesterday-from-NOM weather-NOM good-became
'From yesterday, the weather became good.'

b. Ecey-pwuthe-**lul** cengpwu-ka swuip-ul kumcihayssta.
yesterday-from-ACC government-NOM imports-ACC banned
'From yesterday, the government banned imports.'

(27) a. Minca-ka Yongho-eykey-**lul** ikiessta.
M-NOM Y-DAT-ACC won.over
'Minca won over Yongho.'

b. Minswu-ka Swunhi-eykeyse-**lul** ton-ul ppayasassta.
M-NOM S-from-ACC money-ACC took.away
'Minswu took away money from Swunhi.'

(28) a. Kyenga-eykey-**ka** ke salam-i chincelhayssta.
K-DAT-NOM that person-NOM kind
'That person is kind to Kyenga.'

b. Swunhi-ka cikum-pwuthe-**ka** mwuncey ita.
S-NOM now-from-NOM problem is
'From now on Swunhi has the problem.'

c. Cwuku-ka cantipat-eyse-**ka** elyepta.
soccer-NOM lawn-on-NOM difficult
'It is on the lawn that (to play) soccer is difficult.'

d. Cip-aneyse-**ka** Swunhi-eykey nampyen-i mwusepta.
house-in-NOM S-DAT husband-NOM fears
'In the house, Swunhi fears her husband.'

(29) If a constituent X can take case stacking, the stacked particle will be
a. *ka* if X is a subject; otherwise
b. *lul* if the predicate is an ACC assigner;
c. *ka* otherwise.

Note crucially that *ka* is not always an option for stacking. In particular, it is bad on a DAT goal of a ditransitive (30). It is also important that (29) is not equivalent to saying that the particle that is stacked on X represents a case that can be assigned to X (either by INFL or V), because in many of the examples above, such plain case assignment would be ungrammatical, e.g., (31), as compared to (28d).

(30) a. *Swunhi-ka Chelswu-eykey-**ka** chayk-ul cwuessta.
S-NOM C-DAT-NOM book-ACC gave
('Swunhi gave Chelswu a book.')

b. *Chelswu-eykey-**ka** Swunhi-ka chayk-ul cwuessta.
C-DAT-NOM S-NOM book-ACC gave

(31) *Cip-**i** Swunhi-eykey nampyen-i mwusepta.
house-NOM S-DAT husband-NOM fears
('In the house, Swunhi fears her husband.')

One kind of example seems to contradict the generalization in (29), instantiated the paradigm for the passive of a ditransitive: as (32) shows, both *ka*- and *lul*-stacking are possible on the goal phrase. One suggestion for how to analyze such problem cases is to

say that (32a) and (32b) differ as to whether the goal is the subject or not: in (b) it is, so it must take *ka*, but in (a) the theme is the subject, so the stacked particle must be *lul*, because the verb 'give' is an ACC assigner (33). I do not yet have any independent support for this analysis.

(32) a. Swunhi-eykey-**lul** chayk-i cwuecyessta.
S-DAT-ACC book-NOM was.given
'A book was given to Swunhi.'

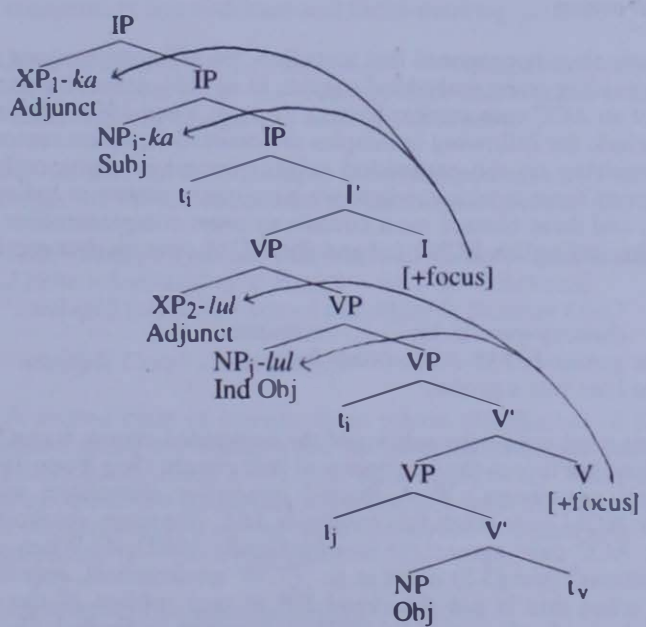
b. Swunhi-eykey-**ka** chayk-i cwuecyessta.
S-DAT-NOM book-NOM was.given
'Swunhi was given a book.' (?)

(33) Swunhi-ka Yenghi-**lul** chayk-ul cwuessta.
S-NOM Y-ACC book-ACC gave
'Swunhi gave Yenghi a book.'

4.3 Analysis

The available data and existing theories of focus underdetermine the precise analysis of focus stacking, so I describe what the analysis needs to achieve and suggest one approach that has the desired effect. The account needs to treat subjects differently from nonsubjects and ACC-assigning predicates differently from non-ACC-assigning predicates. One way to do that is to posit two focus positions, one just above IP, the other just above VP; for concreteness, say the positions are IP- and VP-adjoined. The analysis is schematized in (34).

(34)



(This is the same structure arrived at by J.-Y. Yoon (1989, 1990) based mostly on a different set of facts; Yoon does not discuss stacking on subjects.) See Horvath 1995 for the claim that multiple focus positions in a single language are a parametric option. Choe (1987) argues for a focus position above the subject in Korean. I

provisionally follow Choe in assuming that focus movement may be overt or covert in Korean. Evidently, only subjects can *move* to the higher focus position, perhaps because only they can move out of VP by A-movement. We want IP-focus to be marked by *ka*, and VP-focus to be marked by *lul* if the verb assigns ACC, *ka* otherwise. I do not argue for specific machinery to make the connection between case properties of V and I and the choice of stacked focus marker, but such a connection seems fairly natural, for instance, under a view where a head must license a focus feature by checking. (Indeed, Horvath proposes such a theory, and V and I are two of the possible assigners of this feature in her system.) Then VP-internal elements are blocked from IP-adjunction because a focus must be licensed by the closest focus-licenser for minimality reasons, and VP-adjunction is always a possible focus-licensing position; this correctly rules out cases like (30). This account predicts that if there are adjuncts that can adjoin to either IP or VP, then they should show both focus-marking options, and this seems to be correct (35). Thus, (29a) should be extended to IP-adjuncts.

(35) Ecey-pwuthe-**lul/ka** cengpwu-ka swuip-ul kumcihayssta.
yesterday-from-ACC/NOM government-NOM imports-ACC banned
'From yesterday, the government banned imports.'

5. Extension to related constructions

An analysis of this kind extends straightforwardly to two other constructions where the case particles behave in un-caselike ways *without* being stacked on other case markers. (Such a unification is also suggested by Hong (1992) and J.-Y. Yoon (1989).)

5.1 The "ECM" construction

Several authors have already proposed that so-called "ECM" constructions in Korean, which involve *lul* appearing on an embedded subject, as in (36), demand a treatment of this *lul* wherein it is not an ACC case marker (contra Yoon & Yoon 1991). Arguments against a case analysis include the following (examples are omitted for space reasons): 1) As shown in (36), *lul*-marking on the embedded subject occurs in finite embedded clauses that can contain overt tense marking, where we have every reason to believe that NOM is always assigned, and these clauses must contain an overt complementizer *ko*, so they cannot be IPs. Unlike in English ECM, *lul* and the NOM case marker are in free variation.

(36) John-i Jane-**ul/i** chencay-**yess**-ta-**ko** mitnunta.
J-NOM J-ACC/NOM genius-be.PST-DECL-COMP believe
'John believes that Jane was a genius.'

2) The *lul*-marked element need not be the subject of the embedded clause, it can be virtually any constituent, provided it is at the beginning of that clause. (See Yoon 1986 for additional discussion and arguments.) 3) A floated quantifier associated with the "ECM"ed subject must be NOM even when that subject is ACC (for many speakers), i.e., this *lul* does not trigger ACC case agreement (contra Gerdts 1987). 4) When certain "multiple subject constructions" (see §5.2) occur in an "ECM" environment, only the first NP can be ACC, even when this is not the (head NP of the) subject of the clause (O'Grady 1991). 5) An idiom chunk cannot be "ECM"ed, unlike in English (J.-S. Lee 1991: 318), suggesting that something other than a simple change of case marking is going on.

[illegible] some linguists to suggest that "ECM" *lul* is actually a focus particle (cf. J.-S. Lee 1991, J. Yoon 1986). J.-M. Yoon (1989: 372)

claims explicitly that "ECM" *lul* induces a focus (exhaustive listing) interpretation, citing additionally the fact that indefinites get only a specific reading in this environment (but see C. Lee 1989 for exceptions). I claim that this is simply another instance of *lul* being used to mark focus. As such, it fits easily into my analysis: since the verbs taking "ECM" complements are ACC assigners, as shown in (37), a focused constituent adjoined to the matrix VP (as in J.-Y. Yoon 1990) will be marked with *lul*, if we simply extend (29) beyond stacking to focus-adjunction in general. There is independent evidence from word order and other tests (see Hong 1990) that the "ECM"ed constituent is in the matrix clause at S-structure, e.g., the adverb placement facts in (38).

(37) a. Na-nun Chelswu-ka ttokttokhata-nun kes-**ul** mitnunta.
I-TOP C-NOM be.smart-REL fact-ACC believe
'I believe the fact that Chelswu is smart.'

b. Na-nun Chelswu-**lul** sayngkakhanta.
I-TOP C-ACC think.of
'I think of Chelswu.'

(38) Mary-ka **John-ul enceyna** papo-la-ko sayngkakhanta.
M-NOM J-ACC always fool-be-COMP thinks
'Mary always thinks John to be a fool.' (Hong 1990: 217)

The optionality of "ECM" in (36) simply reflects the optionality of focus marking. In a sentence like (38), both NOM case and VP-focus-marking are trying to be realized on *John*, but since they occupy the same morphological slot, only one can be pronounced, and it is *lul*. If the lower subject happens to be DAT, as in (39), then there is no morphological competition and both case and focus-marking surface.

(39) John-un Chelswu-eykey-**lul** ton-i manhta-ko mitnunta.
J-TOP C-DAT-ACC money-NOM much-COMP believes
'John believes Chelswu to have lots of money.'

Given that we seem to need multiple focus-adjunctions to VP (24), we might then expect that multiple "ECM"ed constituents should be possible, and this seems to be true (40).

(40) John-i hakkyo-eyse-**lul** Mary-**lul** ceil-ila-ko malhayessta.
J-NOM school-LOC-ACC M-ACC no.1-be-COMP said
'John said that it is at school that Mary is Number One.' (J.-Y. Yoon 1990: 133)

5.2 "Multiple Case" constructions

A second class of constructions whose distribution of case particles can be accommodated under my analysis are the so-called multiple subject and multiple object constructions, exemplified in (41) and (42), respectively. There are several varieties with different syntactic and semantic properties, but what they have in common is the use of *ka* or *lul* on multiple NPs, all but one of which are demonstrably not the subject or the object, respectively (J. Yoon 1986, Hong 1992).

(41) a. Ku nongcang-i sakwa-**ka** mas-**i** cohta.
the farm-NOM apple-NOM taste-NOM good
'As for the farm, the taste of the apples is good.'

b. Swunhi-**ka** apeci-**ka** pwucaisita.
S-NOM father-NOM rich.be
'Swunhi's father is rich.'

c. Minswu-**ka** son-**i** khuta.
M-NOM hand-NOM big
'Minswu's hands are big.'

(42) a. Mary-ka Inho-**lul** tung-**ul** ttayliessta.
M-NOM I-ACC back-ACC hit
'Mary hit Inho in the back.'

b. Chelswu-ka chayksang-**ul** tali-**lul** kochiessta.
C-NOM table-ACC leg-ACC fixed
'Chelswu fixed the table's legs.'

The first thing to note is that case-assigning properties of the predicate are relevant to how the nonarguments are marked; with predicates that assign a complement case other than ACC, all the NPs in a multiple object construction take that case: NOM in (43a), DAT in (43b):

(43) a. Na-nun koyangi-**ka** nwun-**i** mwusepta.
I-TOP cat-NOM eye-NOM fear
'I fear the cat's eyes.' (Sohn 1994: 237)

b. Nay-ka Yumi-**eykey** ima-**ey** olunccok-**ey** kissuhayssta.
I-NOM Y-DAT forehead-DAT right.side-DAT kissed
'I kissed Yumi on the forehead, on the right side.' (Y-j Kim 1990: 271)

Also, the very same phrase obligatorily changes case depending on whether the verb is active (i.e., ACC-assigning) or passive:

(44) a. Cengwensa-ka namwu-**lul** kaci-**lul** ccallassta.
gardener-NOM tree-ACC branch-ACC cut
'The gardener cut the tree's branches.'

b. Namwu-**ka** kaci-**ka/*lul** ccalleciko issessta.
*tree-NOM branch-NOM/*ACC be.cut be*
'The tree's branches were being cut.' (Maling 1991: 303)

Thus, it seems initially promising to treat the *ka*s and *lul*s on the nonarguments in this construction as focused and adjoined to IP or VP, taking the same particle as a stacked focus would get in that position (for related observations and proposals, see J. Yoon 1986, Choe 1987, J.-Y. Yoon 1990, I.-J. Cho 1993, Y.-B. Kim 1987, J.-M. Yoon 1989, Y-j Kim 1990, D.-I. Cho 1992, O'Grady 1991). If that is on the right track then this construction provides us more direct evidence that there can be two focus licensers in the same clause at the same time (cf. (34)), since in (45) both focus *ka* and focus *lul* surface:

(45) John-**i** tongsayng-**i** Mary-**lul** ppyam-**ul** ttayliessta.
J-NOM brother-NOM M-ACC cheek-ACC hit
'John's brother hit Mary's cheek.' (J.-Y. Yoon 1990: 93)

Of course, an alternative suggestion would be to appeal to case concord between the subject or object and the adjoined NPs associated with it (e.g., Y-j Kim 1989). However, Maling and Kim (1992) have argued convincingly against such an analysis, on the basis of facts such as those in (46), where the associated NPs do not agree in case. Maling and Kim show that this possibility arises precisely when the main predicate can assign

two different cases: evidently, each NP can choose from among those cases independently, here ACC and DAT.

(46) a. Nay-ka Yumi-**eykey** phal-**ey** cwusa-lul nohassta.
I-NOM Y-DAT arm-DAT shot-ACC gave
'I gave Yumi's arm a shot.'

b. Nay-ka Yumi-**lul** phal-**ey** cwusa-lul nohassta.
c. Nay-ka Yumi-**lul** phal-**ul** cwusa-lul nohassta.
d. ?Nay-ka Yumi-**eykey** phal-**ul** cwusa-lul nohassta.

These facts can be accommodated by a slight extension of my proposal. Specifically, rather than stipulate that the particle used to mark VP-adjoined foci is simply *lul* when the predicate assigns ACC, we allow it to be the particle corresponding to whichever case(s) the predicate assigns. Thus the new generalization is (47), which can be reduced to the single statement (48). Note that this will not adversely affect case *stacking*, where only *ka* and *lul* are possible, because morphological constraints block any other case from getting tacked onto a postposition or the dative *eykey*.

(47) a. IP-adjoined foci take *ka*;
b. VP-adjoined foci take any particle X, where X is the realization of a case assigned by the predicate; if the predicate does not assign case, they take *ka*.

(48) A focus takes any particle X, where X is the realization of a case assigned by its focus-licensing head (*ka* is the default).

6. Conclusions

I have suggested what a focus analysis for stacked *ka* and *lul* might look like in order to explain numerous facts about their distribution. This analysis extends straightforwardly to cover two other constructions that I have argued do not involve case. To the extent that this approach is convincing, it means that sentences like (1c) in Korean are not literally instances of morphological case stacking. I conclude by mentioning why this is a desirable result. If *ka*-stacking on DAT subjects were really structural case, it would mean that licensing in subject position necessarily means receiving the morphological case features canonically associated with that position, and that in general, an NP can bear multiple different morphological case features, such as DAT and NOM. But well-known facts from Icelandic show quite compellingly that this cannot he true, at least not as a universal. In Icelandic, subjects are canonically NOM and trigger person/number agreement on the finite verb, as in (49a). However, certain psych predicates assign DAT case to their subjects (49b). These DAT subjects can appear in all and only the structural positions where NOM subjects can appear, hut they can never trigger person/number agreement on the verb; furthermore, NOM case can appear on an object only when the subject is DAT, and when this happens, the verb agrees in number with that NOM object, as in (49h) (Thráinsson 1979).

(49) a. Við *f*urftum vinnu.
we(NOM) needed(1PL) a-job(ACC)
'We needed a job.'

h. Mér líka *f*essir hílar.
me(DAT) like(3PL) these cars(NOM-PL)
'I like these cars.'

The most obvious (and in my view correct) analysis is that DAT case on a subject blocks a certain feature-checking relationship between the subject and a functional head, namely, the relationship responsible for agreement and NOM case assignment, and allows this relationship to be established with a non-subject. Recall that in Korean, too,

DAT subjects block honorific agreement. Thus, it is plausible that universally, lexical case features block the kind of feature-checking relationship required for morphological NOM case assignment and subject-verb agreement. My analysis of Korean "case stacking," unlike case-based accounts, is compatible with this view, removing the need to posit parametric variation on this point. Structural licensing, however it actually works, does not seem to be the same as, or to depend on, morphological case assignment, as has been suggested by Massam (1985), Cowper (1988), Belletti (1988), Freidin and Sprouse (1991), Marantz (1991), Harbert and Toribio (1993), Harley (1995), etc. In particular, licensing a subject does not imply assigning NOM case to it.

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